

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CR 18-2945 WJ

SUBHANAH WAHHAJ,

Defendants.

UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE REPLY

Defendant Subhanah Wahhaj, by and through undersigned counsel Ryan J. Villa and Justine Fox-Young, moves the Court to extend the deadline within which to file her Reply to the Government's Response to the Motion to Dismiss Counts One and Two as Unconstitutionally Vague for a period of seven (7) days, and as grounds therefore states:

1. On October 8, 2022, Defendants filed their Motion to Counts One and Two as Unconstitutionally Vague. *See* Motion [Doc. 506].
2. On December 2, 2022, the Government filed its Response to Defendants' Motion. *See* Response [Doc. 539].
3. The deadline for Defendants' Reply to the Government's Response is December 16, 2022.
4. Counsel for Defendant Subhanah Wahhaj, Mr. Ryan Villa and Ms. Justine Fox-Young, require additional time to prepare the Reply.
5. Accordingly, counsel requests the Court extend the deadline by seven (7) days to December 23, 2022.

6. The undersigned counsel has contacted counsel for the United States, AUSA Kimberly Brawley, regarding this Motion. Ms. Brawley has indicated that the United States does not oppose this Motion.

WHEREFORE, Counsel for Defendants respectfully request this Court enter an Order extending the time to file their reply to December 23, 2022.

Respectfully submitted,

/s/ Ryan J. Villa

Ryan J. Villa

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CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2022, I filed the foregoing electronically through the CM/ECF system, which caused counsel for the United States to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Ryan J. Villa

RYAN J. VILLA